



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

June 7, 2016

BY EMAIL AND ECF

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

**USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6-9-16**

Re: United States v. William T. Walters, a/k/a "Billy",
S1 16 Cr. 338 (PKC)

Dear Judge Castel:

The Government respectfully writes to the Court about defendant William Walters conditions of release. At the initial conference on June 1, 2016, the Court adopted the bail conditions set earlier that day by Magistrate Judge Andrew J. Peck, except with regard to the defendant's travel restrictions, which were amended by the Court. One of the conditions of bail set by Judge Peck required the parties to confer and fashion a separate bond to be signed by the pilot and co-pilot of the defendant's private jet that was intended to ensure that the pilots did not assist the defendant in violating the travel restrictions included in his bail conditions. Since the bail hearings before Judge Peck and the Court, the Government has learned that the most efficient way to abide by Judge Peck's directive is to have the pilots co-sign the defendant's bail with specific limitations.

Accordingly, the parties jointly request that the Court modify the defendant's bail conditions as follows: Richard Cuda and Joshua Ambruster shall co-sign the bond but shall each

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be liable for \$1 million of the total bond only if either individual knowingly assists the defendant in violating the travel restrictions included in the defendant's bail conditions. } OK

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s/ Daniel S. Goldman
Daniel S. Goldman
Brooke E. Cucinella
Assistant United States Attorney
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cc: Barry H. Berke, Esq. (by ECF)
Paul Schoeman, Esq. (by ECF)

*Application granted
SO ORDERED
J. M. T., VSDJ
6-8-16*